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December 2, 2024

By ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The initial conference scheduled for December 17, 2024 is cancelled. All other dates are stayed. The parties should submit a status report by

*Re: Michele Patterson v. Kroll Bond Rating Agency, LLC,
Case No. 24-cv-7060 (JGK)*

Your Honor:

*January 14, 2025.
so ordered.
D.K.
12/3/24*

We represent Plaintiff Michele Patterson in the above-referenced matter. We submit this letter jointly with Defendant Kroll Bond Rating Agency, LLC ("KBRA").

The Initial Conference in this case is currently scheduled for December 17, 2024, the deadline for additional parties to be joined or causes of action to be asserted is December 20, 2024, the deadline for additional defenses to be asserted is January 16, 2025, and the deadline for completion of discovery is February 17, 2025. The parties have agreed to engage in private mediation through JAMS, which will take place on January 7, 2025, in an effort to explore whether this matter can be resolved at an early stage. The parties agree that the Pilot Discovery Protocols for Counselled Employment Cases apply, and will exchange the categories of documents and information set forth in those protocols in advance of the mediation.

In the interest of proceeding in a manner that increases the possibility of early settlement by avoiding accruing additional costs and attorney time, the parties respectfully request that the Initial Conference be adjourned, and the current case deadlines be postponed, until after the January 7 mediation. No previous adjournments have been requested. The parties believe this would further the goals set forth in the Second Amended Standing Administrative Order (ECF 15) that "[t]he Discovery Protocols require the early exchange of targeted, core discovery, and are intended to frame issues for resolution through mediation and to assist the parties in planning for additional discovery in the event the case is not promptly resolved through mediation." The parties propose that we submit a joint status report by January 14, 2025 to inform the Court either that we have been able to reach a resolution or to propose new discovery deadlines if we have not reached a resolution.

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We appreciate the Court's attention to this matter.

Respectfully submitted,



Daniel Mullkoff